

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JAMAREE JAMES,)
)
)
Plaintiff,)
)
)
v.)
)
RESURGENT CAPITAL)
SERVICES / LVNV FUNDING LLC,)
)
Defendant.)

CIVIL ACTION NO.
1:25-cv-01833-JPB-CMS

DEFENDANT'S MOTION FOR MORE DEFINITE STATEMENT

COMES NOW Defendant Resurgent Capital Services L.P. (“Resurgent”), incorrectly identified in the Complaint as Resurgent Capital Services / LVNV Funding LLC, by and through its undersigned counsel, and hereby moves this Court to order Plaintiff Jamaree James (“Plaintiff”) to plead a more definite statement under Fed. R. Civ. P. 12(e). In support of this Motion, Resurgent relies on the Memorandum of Law in Support of Motion for More Definite Statement, filed contemporaneously herewith.

WHEREFORE, Resurgent respectfully requests that this Court: (1) grant its Motion for More Definite Statement; (2) direct Plaintiff to provide a more definitive statement regarding his claims against Resurgent within fourteen days after Notice of the Order; (3) direct Plaintiff to specify if he is asserting claims against Resurgent, LVNV Funding LLC, or both; (4) strike Plaintiff’s pleading if he does not comply

with the Order; and (5) for such other and further relief as the Court deems just and proper.

Respectfully submitted this the 8th day of April, 2025.

/s/ R. Frank Springfield _____

R. Frank Springfield
Georgia Bar No. 316045
fspringfield@burr.com
BURR & FORMAN LLP
420 North 20th Street, Suite 3400
Birmingham, AL 35203
Telephone: (205) 251-3000
Facsimile: (205) 458-5100

Attorney for Defendant
RESURGENT CAPITAL SERVICES L.P.

CERTIFICATION OF COUNSEL

I hereby certify that the foregoing document has been prepared with Times New Roman, 14 point font, in accordance with Local Rule 5.1.

/s/ R. Frank Springfield

R. Frank Springfield
Georgia Bar No. 316045
fspringfield@burr.com

BURR & FORMAN LLP
420 North 20th Street, Suite 3400
Birmingham, AL 35203
Telephone: (205) 251-3000
Facsimile: (205) 458-5345

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send an e-mail notification of such to the following:

NONE

I hereby certify that I mailed by United States Postal Service the document to the following non-CMF/ECF participants:

Jamaree James
670 St. Mark Way
Fairburn, GA 30213
Jamaree.rjames@gmail.com
Pro se Plaintiff

/s/ R. Frank Springfield

R. Frank Springfield
Georgia Bar No. 316045
fspringfield@burr.com